

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# EXHIBIT 7

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

-----X  
THE SOUTH CAROLINA STATE CONFERENCE OF THE  
NAACP, et al.,

Plaintiffs,

vs. CASE NO. 3:21-CV-03302-JMC-TJH-RMG

THOMAS C. ALEXANDER, et al.,

Defendants.  
-----X

VIDEOCONFERENCE

DEPOSITION OF NEAL COLLINS

(Attending by VTC)

DATE: July 28, 2022

TIME: 10:06 a.m.

LOCATION: Law Offices of

NEXSEN PRUET, LLC

104 South Main Street

Suite 900

Greenville, South Carolina

TAKEN BY: Counsel for the Plaintiff

REPORTED BY: JULIE L. BONOMO

(Attending by VTC)

1 obviously wouldn't apply to Congress. So that's  
2 why I'm kind of bringing this up. If you ask him a  
3 question, it can be assumed that his response is  
4 with respect to Congress.

5 MR. HINDLEY: Yes. If I want to have a  
6 question about state redistricting, I'll say that  
7 specifically.

8 MR. MATHIAS: Okay. Thank you.

9 MR. HINDLEY: Thank you, Andrew.

10 BY MR. HINDLEY:

11 Q. Now, can you describe how the  
12 guidelines guided your process of evaluating maps?

13 A. They -- it was good for me at the  
14 outset to know what the guidelines were and where  
15 we should focus our attention.

16 Q. So did you ever evaluate a map and find  
17 that it didn't comply with the guidelines?

18 A. Honestly, I thought some of the maps by  
19 third parties did not go by the guidelines like we  
20 had to.

21 Q. And did you ever -- did the committee  
22 ever consider a map that might have contradicted  
23 the guidelines?

24 A. Yes. In my opinions, the League of  
25 Women Voters and the ACLU provided such maps.

1 Q. And why do you believe the League of  
2 Women Voters provided a map that contradicted the  
3 guidelines?

4 A. They wanted a higher deviation, and  
5 they also obviously did not care about incumbency.

6 Q. And why did you believe the NAACP's map  
7 contradicted the guidelines?

8 A. Similar -- similar reasons.

9 Q. And did anything else outside of the  
10 guidelines impact your consideration of maps?

11 A. I would say, no.

12 Q. Any like local concerns impact your  
13 consideration of maps?

14 A. Well, I would say local concerns and  
15 the example that I gave would be communities of  
16 interest and public input. I believe the  
17 guidelines do well giving a guide post.

18 Q. Now, I just want to turn to Section 9  
19 the priority of criteria. So according to these  
20 guidelines, the first four are more important; is  
21 that correct?

22 A. Yes.

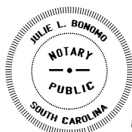
23 THE COURT REPORTER: Can you repeat  
24 that question, please? Sir, can you repeat that  
25 question -- the first?

CERTIFICATE OF REPORTER

I, Julie L. Bonomo, Court Reporter and Notary Public for the State of South Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 10th day of August, 2022, at Charleston, Charleston County, South Carolina.



Julie L. Bonomo  
Court Reporter  
My Commission expires  
July 28, 2027

WITNESSES' NAME: Neal Collins

[illegible]

THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_.

MY COMMISSION EXPIRES: